

Fill in this information to identify the case:

United States Bankruptcy Court for the:
Southern District of New York

Case number (if known): _____ Chapter **11**

☐ Check if this is an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

04/16

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name **Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC**
2. All other names debtor used in the last 8 years
Include any assumed names, trade names, and *doing business* as names
3. Debtor's federal Employer Identification Number (EIN) **68-060351**
4. Debtor's address
- | Principal place of business | | Mailing address, if different from principal place of business |
|------------------------------|--------|---|
| 8 The Green, Suite A | | Post Office Box 1328 |
| Number | Street | Montauk, NY 11954 |
| _____ | | Number, Street City, State & ZIP Code |
| Dover, Delaware 19901 | | Location of principal assets, if different from principal place of business |
| City | State | ZIP Code |
| Kent | | 10 Bedford Street, New York, NY 10014 |
| County | | Number, Street City, State & ZIP Code |
5. Debtor's website (URL) _____
6. Type of debtor
- ☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
- ☐ Partnership (excluding LLP)
- ☐ Other. Specify: _____

Debtor

Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC

Case number (if known) _____

Name _____

7. Describe debtor's business

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the above

B. Check all that apply:

- ☐ Tax-exempt entity (as described in 26 U.S.C. § 501)
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

_____-_____-_____-_____-

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
☐ Chapter 9

☒ Chapter 11. Check all that apply:

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,566,050 (amount subject to adjustment on 4/01/19 and every 3 years after that).
☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ A plan is being filed with this petition.
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

☐ No

☒ Yes. District **Delaware** When **02/20/17** Case number **17-10389** (closed April 2017)

If more than 2 cases, attach a separate list.

District _____ When _____ Case number _____
MM / DD / YYYY

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

☒ No

☐ Yes. Debtor _____ Relationship _____

District _____ When _____
MM / DD / YYYY

List all cases. If more than 1, attach a separate list.

Case number, if known _____

Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC

Debtor

Name

Case number (if known)

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.
What is the hazard? _____
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other _____

Where is the property?

Number

Street

City

State

ZIP Code

Is the property insured?

☐ No

☐ Yes. Insurance agency _____

Contact name

Phone

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

14. Estimated number of creditors

☒ 1-49

☐ 50-99

☐ 100-199

☐ 200-999

☐ 1,000-5,000

☐ 5,001-10,000

☐ 10,001-25,000

☐ 25,001-50,000

☐ 50,001-100,000

☐ More than 100,000

15. Estimated assets

☐ \$0-\$50,000

☐ \$50,001-\$100,000

☐ \$100,001-\$500,000

☐ \$500,001-\$1 million

☒ \$1,000,001-\$10 million

☐ \$10,000,001-\$50 million

☐ \$50,000,001-\$100 million

☐ \$100,000,001-\$500 million

☐ \$500,000,001-\$1 billion

☐ \$1,000,000,001-\$10 billion

☐ \$10,000,000,001-\$50 billion

☐ More than \$50 billion

Debtor Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC
Name

Case number (if known)

16. Estimated liabilities

- | | | |
|--|--|--|
| <input type="checkbox"/> \$0-\$50,000 | <input checked="" type="checkbox"/> \$1,000,001-\$10 million | <input type="checkbox"/> \$500,000,001-\$1 billion |
| <input type="checkbox"/> \$50,001-\$100,000 | <input type="checkbox"/> \$10,000,001-\$50 million | <input type="checkbox"/> \$1,000,000,001-\$10 billion |
| <input type="checkbox"/> \$100,001-\$500,000 | <input type="checkbox"/> \$50,000,001-\$100 million | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million | <input type="checkbox"/> More than \$50 billion |

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature of authorized representative of debtor

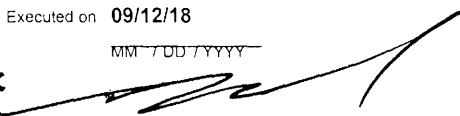
- The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.
- I have been authorized to file this petition on behalf of the debtor.
- I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **09/12/18**

MM / DD / YYYY

X



Signature of authorized representative of debtor

Michael Hayden Sanford

Printed name

Title **Sole Member**

18. Signature of attorney

X

/s/ Daniel A. Osborn

Date **09/12/18**

Signature of attorney for debtor

MM / DD / YYYY

Daniel A. Osborn

Printed name

Osborn Law P.C.

Firm name

43 West 43rd Street, Suite 131

Number Street

New York

NY

10036

City

State

ZIP Code

(212) 725-9800

dosbornlawpc.com

Contact phone

Email address

2429611

New York

Bar number

State

Fill in this information to identify the case and this filing:

Debtor Name **Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC**
United States Bankruptcy Court for the: **Southern District of New York** (State)
Case number (if known): _____

Official Form 202

Declaration Under Penalty of Perjury for Non-Individual Debtors

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ Amended Schedule _____
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☐ Other document that requires a declaration _____

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **09/12/18**

MM / DD / YYYY

x

Signature of individual signing on behalf of debtor

Michael Hayden Sanford

Printed name

Sole Member

Position or relationship to debtor

United States Bankruptcy Court
Southern District of New York

In re Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC

Debtor(s)

Case No. _____

Chapter 11

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

None

September 12, 2018

Date

/s/ Daniel A. Osborn

Daniel A. Osborn
Osborn Law P.C.
43 West 43rd Street, Suite 131
Phone: (212) 725-9800
Facsimile: (212) 500-5115
dosborn@osbornlawpc.com
Counsel for Pursuit Holdings (NY), LLC
f/k/a Pursuit Holdings, LLC

United States Bankruptcy Court
Southern District of New York

In re Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC

Debtor(s)

Case No. _____

Chapter 11

LIMITED LIABILITY RESOLUTION
GRANTING AUTHORITY TO SIGN AND FILE BANKRUPTCY PETITION

The undersigned, being the sole member (the "Sole Member") of Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC, a Delaware limited liability company (the "Company"), hereby takes the following actions and adopts the following resolutions as of this 12th day of September, 2018:

WHEREAS, it is in the best interest of the Company to file a voluntary petition in the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

BE IT THEREFORE RESOLVED, that Michael Hayden Sanford, Sole Member of the Company, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the Company; and

BE IT FURTHER RESOLVED, that Michael Hayden Sanford, Sole Member of this Company is authorized and directed to appear in all bankruptcy proceedings on behalf of the Company, and to otherwise do and perform all acts and to execute and deliver all necessary documents on behalf of the Company in connection with such bankruptcy case, and

BE IT FURTHER RESOLVED, that Michael Hayden Sanford, Sole Member of this Company, is authorized and directed to employ the law firm OSBORN LAW P.C. to represent the Company in such bankruptcy case.

September 12, 2018

/s/ Michael Hayden Sanford

Date

Michael Hayden Sanford, Sole Member of
Pursuit Holdings (NY), f/k/a Pursuit Holdings, LLC

Fill in this information to identify the case:

Debtor Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC

United States Bankruptcy Court for the Southern District of New York
(State)

Case number (If known): _____

☐ Check if this is an amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim		
					If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	Michael I. Knopf 1319 Mountain Summit Road Travelers Rest, SC 29690		contract dispute	disputed	\$5M plus interest		
2	Norma Knopf 1319 Mountan Summit Road Travelers Rest, SC 29690		contract dispute	disputed	\$5M plus interest		
3	NYC Department of Taxation and Finance P.O. Box 680 Newark, NJ 07101-0680		taxes	contingent	t/b/d		
4	Internal Revenue Service Centralized Insolvency Operation P.O. Box 7346 Philadelphia, PA 19101		taxes	contingent	t/b/d		
5	NYCTL 1998-2 Trust c/o A.J. Kaplan, Esq. Seyfarth Shaw LLP 620 Eighth Avenue New York, NY 10 018		property taxes	disputed	t/b/d		
6	BONY Mellon, Paying/Collateral Agent c/o A.J. Kaplan, Esq. Seyfarth Shaw LLP 620 Eighth Avenue New York, NY 10018		property taxes	disputed	t/b/d		
7	Dorsey & Whitney LLP c/o Nick Akerman, Esq. 51 West 52nd Street New York, NY 10019		legal services	disputed	\$40k		
8	Law Offices of James A. Prestiano, P.C. c/o James A. Prestiano, Esq. 631 Commack Road Suite 2A Commack, NY 11725		legal services	disputed	unknown		

Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC

Debtor Name Case number (if known) _____

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9	Delphi Capital Management LLC 1319 Mountain Summit Road Travelers Rest, SC 29690		alleged contract dispute	disputed	unknown		
10	Ten Bedford Condominium, LLC c/o Howard Altman, Grant Tani Barash & Altman 9100 Wilshire Blvd. Beverly Hills, CA 90212		condo fees	disputed	t/b/d		
11	Kasen & Kasen c/o Jenny R. Kasen, Esq. 1000 N. West Street Suite 1200 Wilmington, DE 19801		legal services	disputed	t/b/d		
12	Cohen, Tauber Spievack & Wagner, P.C. Joseph Vann, Esq. 420 Lexington Avenue Suite 4200 New York, NY 10170		legal services	disputed	\$40k		
13	Corbally, Gartland and Rappleyea, LLP c/o John Adams, Esq. 35 Market Street Poughkeepsie, NY 12601		legal services	disputed	t/b/d		
14	Havens & Lichtenberg, PLLC c/o Jeremy Havens, Esq. 28 Railroad Avenue Warwick, NY 10990		legal services	disputed	t/b/d		
15	DEP/BCS NYC Water Board Correspondence Unit PO Box 739055 Flushing, NY 11373		utility	disputed	\$20k; t/b/d		
16	Consolidated Edison Company of NY, Inc. ConEd Law Department 4 Irving Place, Room 1875 -S New York, NY 10003		utility	disputed	\$7k		
17							
18							
19							
20							

United States Bankruptcy Court
Southern District of New York

In re Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC

Debtor(s)

Case No. _____

Chapter 11

VERIFICATION OF CREDITOR MATRIX

I, the Sole Member of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: September 12, 2018

/s/ Michael Hayden Sanford

Michael Hayden Sanford/Sole Member
Signer/Title

BONY Mellon, Paying/Collateral Agent
c/o A.J. Kaplan, Esq.
Seyfarth Shaw LLP
620 Eighth Avenue
New York, NY 10018

Cohen, Tauber Spievack & Wagner, P.C.
Joseph Vann, Esq.
420 Lexington Avenue
Suite 4200
New York, NY 10170

Consolidated Edison Company of NY, Inc.
ConEd Law Department
4 Irving Place, Room 1875 -S
New York, NY 10003

Corbally, Gartland and Rappleyea, LLP
c/o John Adams, Esq .
35 Market Street
Poughkeepsie, NY 12601

Delphi Capital Management LLC
1319 Mountain Summit Road
Travelers Rest, SC 29690

Delphi Capital Management LLC
c/o Eric W. Berry, Esq.
Berry Law PLLC
745 Fifth Avenue, 5th Floor
New York, NY 10151

DEP/BCS
NYC Water Board Correspondence Unit
PO Box 739055
Flushing, NY 11373

Dorsey & Whitney LLP
c/o Nick Akerman, Esq.
51 West 52nd Street
New York, NY 10019

Hampton Bridge Advisors
c/o Michael J. Merendino
179 Park Avenue
Park Ridge, NJ 07656

Havens & Lichtenberg, PLLC
c/o Jeremy Havens, Esq.
28 Railroad Avenue
Warwick, NY 10990

Internal Revenue Service
Centralized Insolvency Operation
P.O. Box 7346
Philadelphia, PA 19101

Kasen & Kasen
c/o Jenny R. Kasen, Esq.
1000 N. West Street
Suite 1200
Wilmington, DE 19801

Law Offices of James A. Prestiano, P.C.
c/o James A. Prestiano, Esq.
631 Commack Road Suite 2A
Commack, NY 11725

MH Sanford & Co., LLC
c/o Michael Hayden Sanford
23 Mckinley Road
Montauk, NY 11954

Michael Hayden Sanford
23 Mckinley Road
Montauk, NY 11954

Michael I. Knopf
1319 Mountain Summit Road
Travelers Rest, SC 29690

Michael I. Knopf
c/o Eric W. Berry, Esq.
Berry Law PLLC
745 Fifth Avenue, 5th Floor
New York, NY 10151

Michael J. Merendino
179 Park Avenue
Park Ridge, NJ 07656

Michael Phillips
c/o Jamestown, L.P.
5 Ninth Avenue
5th Floor Suite
New York, NY 10011

Michael Phillips
c/o Adam Hanan, Esq.
Nadel & Ciarlo, P.C .
3 East 54th Street, 16th Floor
New York, NY 10022

Norma Knopf
1319 Mountan Summit Road
Travelers Rest, SC 29690

Norma Knopf
c/o Gary Greenberg, Esq.
666 Fifth Avenue
New York, NY 1016 7

Norma Knopf
c/o Eric W. Berry, Esq.
Berry Law PLLC
745 Fifth Avenue, 5th Floor
New York, NY 10151

NY State Dept. of Taxation & Finance
Office of Counsel
Building 9
WA Harriman Campus
Albany, NY 12227

NYC Department of Taxation and Finance
P.O. Box 680
Newark, NJ 07101-0680

NYCTL 1998-2 Trust
c/o A.J. Kaplan, Esq.
Seyfarth Shaw LLP
620 Eighth Avenue
New York, NY 10018

Orange Clockwork Trust
c/o Howard Altman, Trustee
Grant Tani Barash & Altman
9100 Wilshire Blvd., Suite 1000
Beverly Hills, CA 90212

Orange Clockwork Trust
c/o Leonard Nathanson, Esq.
Robinson Brog Leinwald Greene Genovese & Gluck, P.C.
875 Third Avenue
New York, NY 10022

Raphael DeNiro
c/o Douglas Elliman
774 Broadway
New York, NY 10003

Sanford Partners, LP
c/o Michael Hayden Sanford
23 Mckinley Road
Montauk, NY 11954

Ten Bedford Condominium, LLC
c/o Howard Altman,
Grant Tani Barash & Altman
9100 Wilshire Blvd.
Beverly Hills, CA 90212